

## M E M O

TO: Mr. M. G. Vagoulas

FROM: Gary A. Molchan

DATE: September 3, 1981

RE: Combe Fill Corp.

Regarding your request to review the closing statements between Chester Hills Inc. and Combe Fill Corp. pertaining to certain properties which heretofore have not been included in our assets, I have found the following:

On December 11, 1965 John B. Filiberto and Catherine G. Filiberto sold to the New Jersey Association for Retarded Children the property in question, Parcel A, Tract 4, Block 16, Lot 6, as identified in Book 1969, Page 993 from the Tax Offices of the County of Morris.

On September 15, 1978 Chester Hills Inc. represented by Joseph B. Filiberto and John C. Filiberto sold the same tract of land to Combe Fill Corp. as noted in Book 2474, Page 376. Since that time, the New Jersey Association of Retarded Children has sold the same tract to Russell L. Duryea, the deed dated February 29, 1980, Book 2541, Page 775.

It is my recommendation that we contact the entities denoted by an asterisk to clarify the blatantly outstanding issue or forego the initial formalities and file papers against J. Filiberto for gross misrepresentation and breach of contract.